

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504
(818) 567-3000



January 12, 1993

CERTIFIED MAIL

Mr. William McKusky, Environmental Manager
GNB Incorporated, Resource Recycling Division
2700 South Indiana Street
P.O. Box 23957
Vernon, California 90023-0957

Dear Mr. McKusky:

REPORT OF VIOLATION AND SCHEDULE FOR COMPLIANCE

On October 27 & 28, 1992, representatives of the Department of Toxic Substances Control (DTSC) conducted inspections of GNB Incorporated, Resource Recycling Division located at 2700 South Indiana Street, Vernon, 90023 (CAD097854541).

As a result of these inspections, violations of hazardous waste statutes and regulations were identified.

Specific violations and required corrective actions are listed below. Failure to correct the identified violations within the schedule provided will result in DTSC citing you for continuing/additional violations.

I. Schedule of Violations

COUNT 1: California Code of Regulations (Cal. Code Regs.), Title 22, Section 66265.173 (a).

GNB stored two hazardous waste containers that were not closed in the reverberatory furnace building. These containers were covered but the lids were not secured. At the time of the inspection, waste was not being added to or removed from these containers.

COUNT 2: Health and Safety Code, Chapter 6.5, Section 25189 (d).

GNB stores hazardous waste at a point which is not authorized (e.g. lead acid batteries stored in the west yard, unlabelled containers, and waste bundles received from KW Plastic).

COUNT 3: Cal. Code Regs., Title 22, Sections 66265.15 (a) and 66265.226 (a) and Interim Status Document (ISD) Part III. 5. (a).

Inspections are not conducted for GNB's rainwater retention pond located at the south end of the facility.

COUNT 4: Cal. Code Regs., Title 22, Sections 66265.56 (j) and ISD Part III 17. (j).

A written report was not submitted to the Department within 15 days (according to the regulations) nor 30 days (according to the ISD) after a fire occurred in GNB's blast furnace feed storage room.

COUNT 5: Cal. Code Regs., Title 22, Section 66265.73 (b) (13).

Land Disposal Restriction notifications were not maintained for Manifest Document Numbers 90787820, 90787819, 92124889, 88316378, 88316367, 91782572, 91657969, and 90149556 under which EPA Waste Number D008 was received by GNB.

COUNT 6: Cal. Code Regs., Title 22, Section 66268.7 (a) (b).

Copies of Land Disposal Restriction notifications were not maintained for Manifest Document Numbers 91529490, 90982474, 91529515, and 91529512 under which EPA Waste Number D008 was shipped offsite.

COUNT 7: Cal. Code Regs., Title 22, Section 66265.15 (d) and ISD Part III. 5. (d).

Inspection logs were not maintained between 2/8/92 and 2/23/92. The Environmental Clerk was on vacation and the inspection logs were not completed in his absence.

COUNT 8: Cal. Code Regs., Title 22, Section 66266.81 (b) (1).

GNB did not store damaged batteries inside closed containers.

COUNT 9: Cal. Code Regs., Title 22, Section 66265.35.

GNB did not maintain aisle space at the battery storage areas nor for the batteries stored in the west yard.

COUNT 10: Cal. Code Regs., Title 22, Section 66265.73 (b) (2) and ISD Part IV. 1. (b) (2).

GNB did not cross-reference, in the operating record, the storage location of hazardous waste received under manifest with the appropriate manifest document numbers.

Mr. William McKusky
GNB, Inc.
Page 3

COUNT 11: Health and Safety Code, Chapter 6.5, Section 25143.9 (a).

Containers stored in the battery storage area were not marked with the words "Excluded Recyclable Material". These containers were identified on a bill of lading as having been generated at GNB's facility in Frisco, Texas.

II. Schedule for Correction

Correct all violations upon receipt of this Report.

Please submit written verification to this office by February 8, 1993, that the above violation(s) have been corrected.

All submittals to the Department, as requested above, must contain the signed certification as required by Section 66270.11, Title 22, California Code of Regulations.

The Department will conduct a reinspection of GNB to verify compliance.

The issuance of this Report Of Violation and Schedule of Compliance does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted herein.

If you have any questions regarding this report, please contact Jerry Lile at (818) 567-3052.

Sincerely,

Maxine Richey, for

Scott Simpson
Branch Chief
Facilities Management Branch

CERTIFIED MAIL
P 390 273 593
(Return Receipt Requested)

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GNB, Inc.
Page 4

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Mr. William McKusky
GNB, Inc.
Page 5

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